CALIFORNIA ALLIANCE FOR GOLF

ROBERT L. BOUCHIER
EXECUTIVE DIRECTOR

December 22, 2008

Jeanine Townsend
Clerk to the Board
Executive Office
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95812-0100

Re: Proposed Recycled Water Policy

Dear Chair Doduc and Members of the Board:

The California Alliance for Golf (CAG) appreciates the opportunity to comment on the proposed Recycled Water Policy. As significant end users/customers in the recycled water system, our constituent golf course owners, operators, equipment suppliers and players are intensely interested in progress toward a viable statewide recycled water policy.

Use of recycled water must increase. This is the predominant view of public policy strategists and accordingly appears in the latest goals listed by the Delta Vision Task Force. Unfortunately, some of the provisions in the proposed policy do not advance the primary policy goal: making use of recycled water easier.

CAG supports articulation of a policy flexible enough to maximize use of this important source of water, while having due regard for needed regulatory oversight to meet health and safety concerns and to ensure sustainability.

As noted in our October 207 and March 2008 comment letters, earlier drafts have addressed issues going well beyond the subject of recycled water. For example, concerns regarding storm water and salt and nutrient management would be better addressed either with stand-alone policies or in the alternative by limiting the reach of the policy to those geographic areas of the State where such issues are of greater relevance. Attempting to resolve so many issues within a statewide recycled water policy only makes the policy more complicated and compliance with the policy more difficult and burdensome to achieve.

With these thoughts in mind, we attach a detailed comment list on the current draft from our technical experts.

Thank you for your consideration.

Robert L. Bouchier

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California Alliance for Golf's Technical Analysis of the Proposed Recycled Water Policy

1. The opening preamble paints a picture that might be factual however, some of the content draws attention away from the purpose of making recycled water easier to use. We propose a summary that focuses exclusively on recycled water.
   Line 16 - Encourages every region to develop S/N mgmt plans by 2014. Key words are locally developed and locally controlled (Line 18). Not every region has salt and nutrient management problems and salt/nutrient issues go well beyond recycled water (i.e. imported water supplies to southern California from the Delta and Colorado River, groundwater intrusion, runoff, etc.). As such, the Policy should provide more clarity as to when such plans should be developed. A separate process for development of S/N plans, which this Policy would be tied into (but distinct from), so that certain actions may be contingent on the existence of or progress towards a S/N plan, in areas where they are a critical issue, but other parts of the Recycled Water Policy could continue towards implementation immediately.
2. The last sentence of the second paragraph (line 22, 28 and 33) mentions of stormwater as a possible source of local water. We agree that stormwater can be a source of additional water supplies, but not in the recycled water policy. Stormwater should have its own policy.
3. Pg 1 Line 35 - Increasing the amount of water use conserved in urban and industrial uses is a laudable goal but should not be included in this policy. Conservation should be encouraged by the SWRCB but it is best carried out on the local level. Goals for conservation are important and if these goals are tied to the increase use of recycled water then it is appropriate being included in this policy.
4. Pg. 2 – First paragraph. The implementation of other policies (e.g., stormwater, conservation, conjunctive use, etc.) needs to occur, but on a separate track. The recycled water policy should be a piece of the overall picture, but should not be contingent on the timing or implementation of the other policies designed to stretch existing supplies.
5. Line 47 - We agree that recycled water is a safe alternative to potable water especially when irrigation and landscape irrigation uses are approved.
6. e. Line 72 – The paragraph is unnecessary and we recommend deleting it.
7. Pg.3 Line 85– We recommend the word goal instead of mandate. Also change the wording in lines 89, 91, 95, 109, 110 and 117.
8. Line 93 – Significant increases in recycled water use are lofty goals of the State and Regional Boards, but such use should only be encouraged to ensure no adverse responses from forced reuse.
9. Section (3) – line 103. Simplify the wording to accurately reflect the Water Code definition.
10. Line 114 - Include end users as supporters for $ 1 billion to be earmarked for additional recycled water project funding.
11. Page 4 – Line 124. Are all of these other organizations aware of this draft policy? Have they been able to comment on it? Are they willing and able to partner up with the State Board to make improvements the policy? How transparent is the policy to those organizations and agencies in which it intends to help?

12. Pg 5 – Salt/Nutrient Management Plans. Points made in the first paragraph (line 164) and again in the second paragraph (line 168) essentially lists why these plans should not be included a recycled water policy. These plans should be a stand-alone policy and should be deleted from this policy.
13. Pg 5 – line 177. Stakeholders should participate in the development and implementation of locally driven and controlled plans. However, these plans should not be a part of this policy. The following specific comments to these plans are provided only if the salt and nutrient management plans remain a component of the recycled water policy.
14. Line 183 - Does the SWRCB have accurate baseline data on salts and nutrients for these basins?
15. Line 190 - Stormwater is prominently listed again. Some communities along the coast are having some issues with stormwater and Areas of Special Biological Significance (ASBS). The policies for ASBSs, stormwater and possibly recycled water should all be complementary and not be burdensome on any one entity trying to implement various components of the other policies.
16. Pg 6. – (b) Line 200 - The inclusion of the word constituents is troublesome. Is there a list of compounds that qualify? Who gets to add a constituent? What agency oversees the addition, deletion or determination of a constituent?
17. (2) Line 224 - This section is very confusing. Are baselines for the basins being set as the monitoring is being performed? How does the SWRCB know when the basins are being threatened if no previous baseline data has been recorded?
18. Line 233 - Monitoring – Who is responsible for conducting the monitoring? Water agencies? End users? Regional Boards? Who is going to pay for the monitoring?
19. Page 7 - (iii) stakeholders – Who are the stakeholders? Those that participated in the process? What about those businesses who know nothing about this monitoring? Do they get an opportunity to participate?
20. (c) Stormwater recharge goals – We believe stormwater should be a separate policy and as such recommend deleting it from this policy.
21. (d) Line 267 - Who is doing the science on this issue? Is there another entity to verify this information?
22. (e) Line 270 - Is this a case-by-case basis or a basin-wide basis?
23. Pg 8 – 7. Landscape Irrigation Projects
    a. Incidental runoff

This section gives end users reasons for unrest. The words and definitions used in this section are vague and subject to interpretation i.e. Line281 – small amounts (volume) - No unit of measurement is listed, Line 282 – unintended, minimal over spray – only one example is listed, Line 284 – water leaving water use area .... if it is part of the facility design, excessive application, etc. Applying leaching fractions and fixing broken pipes are normal occurrences for end users, which under this definition maybe cited as incidental runoff. , Line 286 - incidental runoff may be regulated.... – This statement will not encourage more people to use recycled water.

We strongly encourage a modification of the policy to acknowledge that operation and management plans are the responsibility of the permit holders and not the end users. It is our opinion that incidental runoff will happen. We do not promote golf courses using excess water

to irrigate their golf course. However, we are realistic enough to know that irrigation breaks occur, acts of god take place and human errors are possibilities. If Title 22 water is approved to be discharged, the rationale for this provision seems unwarranted. The language around this topic is one of the hardest concepts for golf courses who currently use recycled water or want to use recycled water to understand. Getting more golf courses to use recycled water is the goal and the policy should be developed to meet this objective.

(1) Implementation of operations and management plans, etc. – A notification system regarding large unintentional events is advisable. The policy should encourage end users to implement industry-based BMP's.

(2) The policy should again encourage the implementation of industry-based BMP's for design, installation, and maintenance of an irrigation system. Allowing SWRCB to review BMP's is recommended.

(3) Precipitation events – Could be included in the industry based BMPs.

(4) Management of ponds – frequently, end users have ponds on their property to provide additional storage during the growing season. To draw down these ponds during the fall in order to provide free board for events that may or may not happen during the winter or spring is gambling at best and poor management at worst. If 25-year events or a 24-hour storms do not occur during the rainy season, and the free board is not replaced with precipitation, then the end user could be short the amount of free board to use during the growing season. The intent is to reduce the amount of recycled water leaving a use area, but during a large event the amount of diluted recycled water leaving the use area seems trivial given the total amount of water and other pollutants now present in the watershed based on these outlier events.

24. Pg 9 – (4) Line 321 - Streamlining landscape irrigation permits is advisable and recommended. We would like the Water Board to clarify the language "actively participate in the development and implementation of a salt/nutrient management plan" as a requirement imposed on recycled water producers and purveyors, not individual users. We also think the monitoring language involving emerging contaminants is premature and does not seem consistent with streamlining the process. We recommend that the provision requiring monitoring of CECs at a specified frequency be deleted, or at a minimum, the policy be clarified to state the monitoring obligation is imposed on the producer/purveyor not the end user.
25. (2) Line 343 - Each irrigation project is subject to an operations and management plan that specifies agronomic rates, etc. Who is qualified to review these operation and management plans? Do the regional boards have staff competent in evaluating this type of information? Will Regional Boards be recommending rate structures to local agencies? Does the customer have any recourse should a dispute arise? May they hire their own consultants to settle disputes on any of these issues?
26. Pg 10 Line 352 – Accounting for nutrient content in recycled water is difficult as it can vary considerable from day to day. Who will provide the measured concentration level of nutrients to the end user, the recycled water supplier, regional board, others?
27. (b) Line 391 – The term "disposal of waste" needs to be defined or revised. How can we talk about increase the use of recycled water when we still refer to it as a waste?

28. (b) Line 393 – Are the terms "pollution or nuisance" the appropriate terminology?
29. (1) Line 404 – How were the assimilative capacity percentages created or calculated? What other agencies/organizations provided scientific input to support this bullet point? How many of the Regional Boards have baseline assimilative capacity on the basin level? Sub-basin level?
30. Pg 12, Lines 435 & 436 – Again, we do not support the inclusion of salt/nutrient management plans in the recycled water policy. We feel this should be a stand-alone policy with ample opportunity for local stakeholder input.
31. (2) Line 442 – The mass balance approach needs to be explained in greater detail. We do not support this concept until adequate details are peer reviewed and data verification has occurred. Adequate public and academic comment periods on these scientific methods are also strongly encouraged.
32. (3) Line 459 – We agree that the information regarding the knowledge of PPCP/EDCs is incomplete. Analytical capabilities are always more advanced than the interpretative aspect of the information. Best Management Practices are highly encouraged and supported.
33. Pg. 13 (1) Line 472 – We prefer the blue-ribbon task force panel being co-managed by the State Water Board and CDPH.
34. Funding - Line 505 – "... CDWR to provide funding for the development of S/N plans." In line 177 on Page 5 "stakeholders have agreed to fund" ..... The wording needs to be consistent throughout the document.
35. Pg 14 Line 510 – We do not support the inclusion of wording for stormwater recharge projects in the recycled water policy. Again, stormwater should have its own policy which is complimentary to the other policies developed by the State Water Board.
36. Line 514 – Delete this section.

Technical Analysis conducted by:

Bio: MICHAEL T. HUCK

Mike Huck is an independent consultant providing irrigation, turfgrass, and water quality consulting to the golf industry in the western United States. He has over twenty-five years experience in the industry previously working as an agronomist with the United States Golf Association's Green Section and as a golf course superintendent at various Southern California golf courses using recycled irrigation water. He has a Bachelor of Science Degree in Ornamental Horticulture with a Turfgrass Management Emphasis from the California State Polytechnic University, Pomona, California. He also teaches a seminar for the Golf Course Superintendents Association of America on the subject of irrigation water quality assessment and management and has co-authored a book titled: Turfgrass and Landscape Irrigation Water Quality: Assessment and Management that is currently being published.
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Bio: MICHAEL D. McCULLOUGH

Mike McCullough is the Director of Environmental and Water Resources for the Northern California Golf Association. He has over 9 years of experience in the turf industry. He is currently the Principal Investigator of a two-year, multi-state research project to determine if attenuation of pharmaceutical and endocrine disrupting compounds can occur on golf courses that utilize recycled water. He has a Masters degree in Horticulture from Oklahoma State University as well as a Bachelor's degree in Ornamental Horticulture from California State Polytechnic University, Pomona, California.